

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Latipah Sharde Johnson, Debtor

**Case No. 25-00910-JAW
CHAPTER 7**

**MOTION FOR AUTHORITY TO REDEEM PERSONAL
PROPERTY AND APPROVAL OF ASSOCIATED FINANCING
AND ATTORNEY FEES UNDER 11 U.S.C. 722**

Now comes the Debtor by and through counsel, and moves the court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. Debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on 04/07/2025.
2. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as:
 - a. 2016 Lincoln MKZ
 - b. VIN: 3LN6L260GR602981.
3. The interest of the Debtor in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.
4. The allowed secured claim of said Creditor for purposes of redemption, the “redemption value”, should be determined to be not more than \$4,125.00 as evidenced by the attached written appraisal.
5. Arrangements have been made by the Debtor to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.
6. The payment for this proposed redemption is to be financed through Prizm Financial Company, LLC, with all of the particulars of that financing (interest rate, finance charge, amount financed, total of payments, amount of payments, etc.) set forth in full detail in

the attachments hereto. As demonstrated there, the monthly amount, term of the payments and the overall amount of the repayment will be decreased significantly through the proposed redemption. Moreover, the Debtor has agreed to borrow and disperse additional funds in the amount of \$700.00 from their loan with Prizm Financial Company, LLC, for representation of the debtor(s) in securing for the benefit of the debtor(s) an order granting the debtor(s) the right to redeem under 11 U.S.C. 722 a certain motor vehicle, such compensation being in addition to that previously disclosed and being for services rendered beyond the scope of the legal services to have been rendered for such compensation heretofore disclosed.

WHEREFORE, the Debtor requests the Court to order the said Creditor to accept from the Debtor the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor requests the Court to determine the value of the property as of the time of the hearing on such objection.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

The Rollins Law Firm, PLLC

P.O. Box 13767

Jackson, MS 39236

601-500-5533

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon:

By Mail:

Westlake Portfolio Services, Inc.
Attn: Bankruptcy
PO Box 76809
Los Angeles, CA 90054

Westlake Portfolio Services, Inc.
c/o Corporate Creations Network, Inc
7 Professional Pkwy #101
Hattiesburg, MS 39402

By ECF notice:

U.S. Trustee

Chapter 7 Trustee

on this 27th day of May 2025.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.